

# **EXHIBIT 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

XAVIER WALKER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 20 CV 7209
	)	
CITY OF CHICAGO, et al.,	)	Judge GUZMAN
	)	
Defendants.	)	

**PLAINTIFF'S AMENDED ANSWERS TO DEFENDANT  
WRIGHT'S FIRST SET OF INTERROGATORIES**

NOW COMES the Plaintiff, XAVIER WALKER, by and through his counsel,  
pursuant to Fed. R. Civ. P. 33, answering the First Set of Interrogatories of the  
Defendant, DAVID WRIGHT, as follows:

**INTERROGATORY NO. 1:**

Do you contend that Yvette Hill (also known as Myriam Tillman, Myriam Williams, Snuggles) had any involvement in the homicide of Marek Majdak or committed any other illegal action relating to the incidents in Plaintiff's Amended Complaint? If so, please describe each alleged illegal action that you contend was committed by Yvette Hill and provide the complete factual basis for your contention. Please be advised that defendants are relying on the response to this Interrogatory to provide a full and complete exposition of the matters to be introduced at trial relating to the subject matter herein and intend to move in limine to bar any matters not specifically disclosed herein.

**ANSWER: I do not know who was involved in the murder of Marek Majdak as I was not present. I do contend that Yvette Hill was a reasonable avenue of inquiry into the murder of Marek Majdak that the defendants did not pursue.**

**INTERROGATORY NO. 2:**

Is it your contention that the detectives involved in the Marek Majdak homicide investigation failed to sufficiently investigate any alleged involvement of Yvette

Hill (also known as Myriam Tillman. Myriam Williams. Snuggles) may have had in the homicide of Marek Majdak or any other illegal act relating to the incidents in Plaintiff's Amended Complaint? If so, please describe each alleged illegal action that you contend was committed by Yvette Hill that the detectives failed to sufficiently investigate and provide the complete factual basis for your contention. Please be advised that defendants are relying on the response to this Interrogatory to provide a full and complete ex position of the matters to be introduced at trial relating to the subject matter herein and intend to move in limine to bar any matters not specifically disclosed herein.

**ANSWER: The defendants failed to take a statement from Ms. Hill, failed to corroborate her whereabouts at the time of the murder, failed to take a DNA sample from Ms. Hill, and failed to identify her known associates. Investigation continues.**

**INTERROGATORY NO. 3:**

Do you contend that "Red" or "Darnell" had any involvement in the homicide of Marek Majdak or committed any other illegal action relating to the incidents in Plaintiff's Amended Complaint? If so, please describe each alleged illegal action that you contend was committed by Red and/or Darnell and provide the complete factual basis for your contention. Please be advised that defendants are relying on the response to this Interrogatory to provide a full and complete exposition of the matters to be introduced at trial relating to the subject matter herein and intend to move in limine to bar any matters not specifically disclosed herein.

**ANSWER: I do not know who was involved in the murder of Marek Majdak as I was not present. I do contend that "Red" and/or "Darnell" was a reasonable avenue of inquiry into the murder of Marek Majdak that the defendants did not pursue.**

**INTERROGATORY NO. 4:**

Is it your contention that the detectives involved in the Marek Majdak homicide investigation failed to sufficiently investigate any alleged involvement of "Red" and/or "Darnell" may have had in the homicide of Marek Majdak or any other illegal act relating to the incidents in Plaintiffs Amended Complaint? If so, please describe each alleged illegal action that you contend was committed by Red and/or Darnell that the detectives failed to sufficiently investigate and provide the complete factual basis for your contention. Please be advised that defendants are relying on the response to this Interrogatory to provide a full and complete exposition of the matters to be introduced at trial relating to the subject matter

herein and intend to move in limine to bar any matters not specifically disclosed herein.

**ANSWER: The defendants failed to identify "Red" and "Darnell", failed to take a statement from them, failed to corroborate their whereabouts at the time of the murder, failed to take a DNA sample from them, and failed to identify their known associates. Investigation continues.**

**INTERROGATORY NO. 5:**

Do you know the identity of "Red" or "Darnell". Please provide all identifying information in your knowledge or possession relating to Red or Darnell, including any nicknames, addresses, phone numbers, websites, social media handles, known family members or acquaintances. In answering this Interrogatory, if you believe any other individual has any such information, please identify that individual and their contact information.

**ANSWER: No.**

**INTERROGATORY NO. 6:**

Do you contend that one or more of the Defendant Officers witnessed another Defendant Officers' use of unreasonable force on you on May 29 or May 30, 2000? If so, identify the Defendant Officer who witnessed the use of unreasonable force on you, identify the Defendant Officer who was responsible for using the unreasonable force, describe the particular injury suffered by you, if any as a result of the use of unreasonable force, state when and where the injury was inflicted, and whether you believe that any Defendant Officer had a reasonable opportunity to prevent the injury and the factual basis for your allegation.

**ANSWER: Defendants Sanders Wright and used force against me. Defendants Holy, Pietryla, Brzezniak, Wolverton, and Cruz were all present and/or participated in unreasonable use of force against me. The force used included tackling me and the defendants using their feet, knees, and hands to making forcible contact to my torso, neck, and face. This occurred when I was kidnapped off of the street and also throughout my unlawful detainment at the police station.**

**INTERROGATORY NO. 7:**

Please list the name, address, and telephone number of each expert you expect to call as a witness at trial and for each such expert, please provide:

- (a) the subject matter on which each expert is expected to testify;
- (b) the substance of all facts to which each expert is expected to testify;

- (c) a summary of the opinion of each expert; and
- (d) a comprehensive list of all cases in which the expert has provided expert testimony, including case number and jurisdiction, and the name, address and telephone number of the attorney or party responsible for hiring the expert.

**ANSWER: Plaintiff objects that this interrogatory is premature and will timely supplement during expert discovery.**

**INTERROGATORY NO.8:**

Do you contend that detectives and police officers investigating the murder of Marek Majdak were first led to Xavier Walker's possible involvement in the murder by Maurice Wright? If not, please identify the individual(s) who instead first lead police to investigate Xavier Walker in the murder. Please provide the complete factual basis for your contention. Please be advised that defendants are relying on the response to this Interrogatory to provide a full and complete exposition of the matters to be introduced at trial relating to the subject matter herein and intend to move in limine to bar any matters not specifically disclosed herein.

**ANSWER: No. No one reasonably lead defendants to honestly believe I had any knowledge, role, or participation in the murder of Marek Majdak as I was not in any way involved.**

**INTERROGATORY NO. 9:**

Do you contend that Robert Bartik was personally involved in violating Xavier Walker's constitutional rights? If so, please state what personal involvement, in the form of specific actions, Plaintiff alleges Robert Bartik had in violating such rights, and provide the complete factual basis for your contention. Please be advised that defendants are relying on the response to this Interrogatory to provide a full and complete exposition of the matters to be introduced at trial relating to the subject matter herein and intend to move in limine to bar any matters not specifically disclosed herein.

**ANSWER: Yes. Defendant Bartik coerced a false confession from Jovanie Long to implicate me. I was not present when the false confession was coerced and defer to the pleadings of Jovanie Long in relation to his allegations of abuse and torture for a more complete statement of how it was accomplished.**

**INTERROGATORY NO. 10:**

Do you contend that John Riordan was personally involved in violating Xavier

Walker's constitutional rights? If so, please state what personal involvement, in the form of specific actions. Plaintiff alleges John Riordan had in violating such rights, and provide the complete factual basis for your contention. Please be advised that defendants are relying on the response to this Interrogatory to provide a full and complete exposition of the matters to be introduced at trial relating to the subject matter herein and intend to move in limine to bar any matters not specifically disclosed herein.

**ANSWER: Yes. Defendant Riordan coerced a false confession from Jovanie Long to implicate me. I was not present when the false confession was coerced and defer to the pleadings of Jovanie Long in relation to his allegations of abuse and torture for a more complete statement of how it was accomplished.**

Dated: 11 April 2022

Respectfully Submitted,

**XAVIER WALKER**

By: /s/Jeanette Samuels  
*One of Petitioner's Attorneys*

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v.	)	No. 20 CV 7209
	)	
CITY OF CHICAGO, et al.,	)	Judge GUZMAN
	)	
Defendants.	)	

**VERIFICATION**

I, XAVIER WALKER, do hereby swear or affirm that the foregoing answers  
are true and accurate to the best of my knowledge and belief.



Xavier Walker